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MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT TITLE V OPERATING PERMIT

24580 Silver Cloud Court Monterey, CA 93940 Telephone: (408) 647-9411

ISSUED TO:

Pacific Gas and Electric Company Moss Landing Power Plant P.O. Box 27 Moss Landing, CA 95039-0027

PLANT SITE LOCATION:

Highway 1 and Dolan Road Moss Landing, CA 95039

ISSUED BY:

Douglas Quetin, Air Pollution Control Officer Date

ORIS Code: 0260

Nature of Business: Electric Power Generation

SIC Code: 4911 - Electric Power Generation

RESPONSIBLE OFFICIAL: ALTERNATIVE RESPONSIBLE OFFICIAL:

Name: E. James Macias Name: Randal S. Livingston

Title: Senior Vice President & General Manager Title: Manager

Generation, Transmission & Supply Steam Generation

Phone: (415) 973-1441 Phone: (415) 973-6950

FACILITY CONTACT PERSON:

Name: Steve Abbott

Title: Environmental Coordinator

Phone: (408) 633-6649

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FACILITY DESCRIPTION

Pacific Gas and Electric's Moss Landing Power Plant is an electric generating facility located in Moss Landing, California. The facility has a net power production capacity of approximately 1,500 megawatts from two operating power generating units. The two operating units, Units 6 and 7 (Boilers 6-1 and 7-1) began operation in 1967 and 1968, respectively.

EQUIPMENT DESCRIPTION

POWER GENERATION FACILITY CONSISTING OF:

TWO 750 MW UNITS - BOILERS NUMBER 6-1 & 7-1 EACH CONSISTING OF:

Steam Generator, Babcock and Wilcox Company, Once-Through, Radiant, Reheat, Pressurized Furnace Type, Nominal 6500 MMBtu/hr, Natural Gas-Fired With Fuel Oil Standby.

Combustion Control And Burner Management Provided By Westinghouse Integrated WDPF Distributed Control System.

Steam Production Rate: Nominal 5,100,000 Lb/hr (At 1005° F And 3830 Psia)

Forced Draft Fans:

Four (4) Forced Draft Fans, Each Rated At 400,000 CFM At 40.8 Inches H₂O and 80° F.

Air Preheaters:

Two (2) Ljungstrom Regenerative Air Preheaters, Each With 334,800 Ft² Of Heating Surface And Equipped With The Following Fallout Type Particulate (FTP) Control Measures:

Stainless Steel Intermediate And Cold-End Baskets, With Sootblower, Retractable Type, Electrically Driven, Using Outlet Steam At 600 Psig & 738° F. Sootblower Configured For Reverse Air Sootblowing (Towards The Boiler),

Air Preheater Drain System And Stack Wash Collection System.

Burners And Overfire Air Ports:

Sixteen (16) Burner Cells Total, Eight (8) Front Wall, Eight (8) Back Wall.

Each Burner Cell Equipped With Three (3) Babcock & Wilcox S-Type Low NO_x Burners, And Two (2) Ignitors.

Each S-Burner Equipped With Total Air Sliding Damper, Adjustable Spin Vanes, Core Air Sliding

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Disk, Oil Atomizer, And Gas Spud Assembly.

Eight (8) Dual Zone Overfire Air Ports, Four (4) Front Wall, Four (4) Back Wall.

Fuel Additive System:

18,000 Gallon (30 Day Supply) Main Additive Storage Tank Serving Both Units 6-1 & 7-1, Associated Pumps, Piping, & Hardware.

Sootblowing Equipment Serving Boiler:

Forty-Four (44) Sootblowers Total, Electrically Driven, Long Retracting Lance Type Using Outlet Steam @ 600 Psig & 738° F (FTP Control Requirement).

Gas Recirculation Fans:

Two (2) Flue Gas Recirculation Fans, Centrifugal Type, Each Rated At 252,000 CFM @ 12.5 Inches H₂O Static Pressure.

Continuous Emissions Monitoring System:

Continuous Emissions Monitor, Extractive Type, Measuring NO, CO, & CO₂ Emissions.

Exhaust Stack:

500 Ft High Above Grade, 66 Ft O.D. At Base, 20 Ft O.D. At Top.

NATURAL GAS CONDENSATE TANK

One 700 Gallon Aboveground Storage Tank To Store Natural Gas Condensate From The Fuel Gas Metering System.

FUEL OIL STORAGE TANKS

One 250,000 Bbl Nominal Capacity And Eight (8) 500,000 Bbl Nominal Capacity Fuel Oil Storage Tanks.

STARTUP PACKAGE BOILER

One Nebraska Boiler, Self Contained Packaged Forced Draft Steam Boiler, With A Coen Low NO, Burner Rated At 76.9 MMBtu/hr, Natural Gas Fired.

GASOLINE STORAGE TANK

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One 4,000 Gallon Underground Gasoline Storage Tank With Coaxial Vapor Recovery And Submerged Fill Equipment.

ABRASIVE BLASTING EQUIPMENT

Abrasive Blasting Booth With Stationary Blast Equipment, Compressed Air Provided By Electric Compressor, And Portable Abrasive Blasting Equipment With Compressed Air Provided By Electric Or Diesel Fired Compressor.

PAINT SPRAY FACILITY

Indoor Paint Spray Area Located In The Staging Area Of the Sand Blasting Facility.

EMERGENCY GENERATOR

Cummins/Onan Generator Set, 1505 BHp, 1,000 Kw Output.

LABORATORY FUME HOODS

Fume Hoods, Located In Chemical Laboratory.

FEDERALLY ENFORCEABLE EMISSION LIMITS AND STANDARDS

- 1. Starting on January 1, 2000, Pacific Gas and Electric Company shall hold Sulfur Dioxide Allowances in the compliance subaccounts for Boilers 6-1 and 7-1 not less than the total annual emissions of sulfur dioxide for the previous calendar year from each boiler. [District Rule 219]
- 2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than Ringelmann 1 or equivalent 20% opacity. [District Rule 400]
- 3. Particulate matter shall not exceed 0.15 grains per standard dry cubic foot in any exhaust stream. [District Rule 403]
- 4. Sulfur compounds calculated as sulfur dioxide (SO₂) shall not exceed 0.2 percent by volume in any exhaust stream. [District Rule 404]
- 5. Oxides of Nitrogen, calculated as nitrogen dioxide (NO₂), from the Startup Package Boiler or the Emergency Generator shall not exceed 140 lbs/hr. [District Rule 404]

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- 6. Oxides of Nitrogen, calculated as nitrogen dioxide (NO₂), from Boiler 6-1 or 7-1 shall not exceed 225 ppmv, calculated at 3 percent O₂, dry. [District Rule 404]
- 7. Oxides of Nitrogen, calculated as nitrogen dioxide (NO₂), from the Startup Package Boiler shall not exceed 350 ppmv, calculated at 3 percent O₂, dry. [District Rule 404]
- 8. The sulfur content on any fuel oil used at the facility shall not exceed 0.5 percent by weight. [District Rule 412]
- 9. No more than 40 pounds per day, nor more than 8 pounds per hour of photochemically reactive solvent containing materials, as defined in District Rule 416, shall be discharged from the Paint Spray Facility. [District Rule 416]
- 10. No more than 3,000 pounds per day, nor more than 450 pounds per hour of non-photochemically reactive solvent containing materials, as defined in District Rule 416, shall be discharged from the Paint Spray Facility. [District Rule 416]
- 11. Pacific Gas and Electric Company shall store no organic material in the Fuel Oil Storage Tanks with a vapor pressure equal to or greater than 1.5 psi until such time that the tanks are equipped with vapor control devices as required in District Rule 417. [District Rule 417]
- 12. Pacific Gas and Electric Company shall operate the storage tank at gasoline dispensing facility with a permanent submerged fill pipe. [District Rule 418]
- 13. Pacific Gas and Electric Company shall limit emissions of volatile organic compounds by the use of architectural coatings which comply with the requirements of District Rule 426. [District Rule 426]
- 14. Until such time that Boilers 6-1 or 7-1 operate under the limits contained in conditions 21 or 22, oil and mixtures of oil and natural gas shall not be used as a fuel in Boilers 6-1 or 7-1, except in the event of Emergency Conditions or a Force Majeure Natural Gas Curtailment as defined in Rule 431. [District Rule 431]
- 15. NO_x emissions from Boilers 6-1 and 7-1 shall not exceed 90 ppm during operation on natural gas and at loads in excess of 400 gross MW. This limit is based on a one (1) hour average at three (3) percent oxygen (O₂) on a dry basis. [District Rule 431]
- 16. NO_x emissions from Boiler 6-1 shall not exceed 450 lbs/hr during operation on natural gas and at loads at or below 400 gross MW. This limit is based on a (1) hour average. [District Rule 431]
- 17. NO_x emissions from Boiler 7-1 shall not exceed 450 lbs/hr during operation on natural gas and at

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loads at or below 400 gross MW. This limit is based on a (1) hour average. [District Rule 431]

- 18. NO_x emissions from all boilers providing steam for power generation at the facility shall not exceed 9.64 tons per day when averaged over the period of May 1 through October 31 annually. [District Rule 431]
- 19. NO_x emissions from all boilers providing steam for power generation at the facility shall not exceed 0.30 pounds per million BTU heat input. [District Rule 431]
- 20. No later than December 31, 1998, Pacific Gas and Electric Company shall submit an Implementation Plan for compliance with the provisions of Subsection 3.7.3 of Rule 431. [District Rule 431]
- 21. Effective December 31, 2000, NO_x emissions from one of the 750 MW Units shall not exceed 10 ppm during operation on natural gas and 25 ppm during operation on fuel oil. These limits are based on a one (1) hour average at three (3) percent oxygen (O₂) on a dry basis. [District Rule 431]
- 22. Effective December 31, 2001, NO_x emissions from Boilers 6-1 and 7-1 shall not exceed 10 ppm during operation on natural gas and 25 ppm during operation on fuel oil. These limits are based on a one (1) hour average at three (3) percent oxygen (O₂) on a dry basis. [District Rule 431]
- 23. NH₃ from any emissions control device installed and operated pursuant to the requirements of Rule 431 shall not exceed 10 ppm, based upon a 60-consecutive minute average at three (3) percent oxygen (O₂) on a dry basis. [District Rule 431]
- 24. CO emissions from Boilers 6-1 and 7-1 shall not exceed 400 ppm during steady-state compliance tests based upon a 60-consecutive minute average and shall not exceed 1000 ppm during normal operations based upon a one (1) hour clock-hour average at three (3) percent oxygen (O₂) on a dry basis. [District Rule 431]
- 25. Pacific Gas and Electric Company shall limit emissions of volatile organic compounds during solvent cleaning and degreasing operations pursuant to the requirements of District Rule 433. [District Rule 433]
- 26. Pacific Gas and Electric Company shall comply with the requirements of Sections 61.145 through 61.147 of the National Emission Standard for Asbestos for all demolition and renovation projects. [40 CFR Part 61, Subpart M]

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27. Pacific Gas and Electric Company shall comply with the requirements of 40 CFR Part 82 - Protection of Stratospheric Ozone [40 CFR Part 82]

TESTING REQUIREMENTS AND PROCEDURES

- 28. The equipment installed for the continuous monitoring of CO₂ and NO_x shall be maintained and operated in accordance with 40 CFR Parts 72 and 75. [District Rule 219]
- 29. The equipment for the continuous monitoring of CO shall be maintained and operated in accordance with 40 CFR Part 60 Appendix F and with the ability to calculate CO emission concentrations corrected to three (3) percent oxygen on a dry basis. [District Rule 431]
- 30. The continuous emissions monitoring systems shall continuously record the measured gaseous concentrations, and shall calculate and continuously monitor and record the NO_x and CO concentrations corrected to three (3) percent oxygen (O₂) on a dry basis, and the NO_x and CO mass emission rates in pounds per hour, and pounds per day. [District Rule 431]
- 31. A written Quality Assurance program must be established in accordance with 40 CFR Part 75, Appendix B for NO_x and 40 CFR Part 60, Appendix F for CO which includes, but is not limited to: procedures for daily calibration testing, quarterly linearity and leak testing, recordkeeping and reporting implementation, and relative accuracy testing. [District Rule 219]
- 32. No testing is specified for the generic (Rule 400) opacity requirement from condition number 2. The equipment is assumed to be in compliance with the opacity requirement due to historical operations (including the non-federally enforceable requirement for the operation of continuous opacity monitors on Boilers 6-1 and 7-1) and local compliance inspections without opacity violations. If testing is conducted for condition number 2, Pacific Gas and Electric Company should conduct testing in accordance with the methodology contained in EPA Method 9 or equivalent method and the averaging/aggregating period contained in District Rule 400. [District Rule 218]
- 33. No testing is specified for the (Rule 403) particulate matter emission standard from condition number 3. The fuel burning equipment is assumed to be in compliance with the particulate matter emission standard based upon the engineering calculations contained in the evaluation report. If testing is conducted for condition number 3, Pacific Gas and Electric Company should conduct testing in accordance with the methodology contained in EPA Method 5 or equivalent method. [District Rule 218]
- 34. No testing is specified for the (Rule 404) sulfur concentration limit in condition number 4. The fuel burning equipment is assumed to be in compliance with this sulfur concentration limit based upon the engineering calculations contained in the evaluation report. If testing is conducted for condition number 4, Pacific Gas and Electric Company should conduct testing in accordance with the methodology contained in EPA Method 6 or equivalent method. [District Rule 218]

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35. No testing is specified for the (Rule 404) NO_x (oxides of nitrogen) limit in conditions number 5, 6, and 7. The fuel burning equipment is assumed to be in compliance with these NO_x limits based upon the engineering calculations contained in the evaluation report. If testing is conducted for conditions number 5,6, and 7, Pacific Gas and Electric Company should conduct testing in accordance with the methodology contained in EPA Method 7E or equivalent method. [District Rule 218]

- 36. No testing is specified for the (Rule 431) NO_x limits contained in conditions 15, 16, 17, and 18. Continuing compliance with these limits will be assured by the continuous emission monitoring (CEM) system. [District Rule 218]
- 37. At such time that Pacific Gas and Electric Company installs and begins operating a catalytic emissions reduction device that utilizes ammonia, monthly source tests shall be performed to verify compliance with condition 23. Pacific Gas and Electric Company shall conduct this testing in accordance with the collection method specified in BAAQMD Source Test Procedure ST-1B and the analysis specified in EPA method 350.3. [District Rule 218]
- 38. No testing is specified for the (Rule 431) CO limits contained in condition 24. Continuing compliance with these limits will be assured by the continuous emission monitoring (CEM) system. [District Rule 218]
- 39. Testing of all fuel oil delivered to the facility shall be conducted prior to or upon receipt of the fuel oil, or in lieu of testing a manufactures certification of the sulfur content of the fuel oil shall be supplied at the time of delivery. Pacific Gas and Electric Company shall conduct testing in accordance with ASTM D1552-83 or ASTM D1552-83 or equivalent method or shall receive certification as to the sulfur content of the fuel oil from the manufacturer to verify compliance with condition number 8. Pacific Gas and Electric Company shall furnish the District the certification or written results of the test prior to firing the fuel oil, but in no case later than thirty (30) days of completion. [District Rule 218]
- 40. Testing of all fuel oil delivered to the facility for storage in the tank farm shall be conducted prior to receipt of fuel oil. Pacific Gas and Electric Company shall conduct testing in accordance with ASTM D323-90 or equivalent method to verify that vapor control devices as specified in condition number 11 are not required. Pacific Gas and Electric Company shall furnish the District written results of the test prior to the storage of the fuel oil in the tank farm, but in no case later than thirty (30) days of completion. [District Rule 218]

RECORD KEEPING REQUIREMENTS

41. Pacific Gas and Electric Company shall monitor SO₂ emissions in accordance with 40 CFR Part 72 and 75. [District Rule 219]

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- 42. Pacific Gas and Electric Company shall maintain a daily log which records the amount and type of solvent containing material consumed in the paint spray facility to verify compliance with conditions 9 and 10. [District Rule 416]
- 43. As applicable Pacific Gas and Electric Company shall maintain the following general records of required monitoring information [District Rule 218]:
 - A) the date and time of sampling or measurements;
 - B) the date(s) analyses were performed;
 - C) the company or entity that performed the analyses;
 - D) the analytical techniques or methods used;
 - E) the results of such analyses;
 - F) the operating conditions existing at the time of sampling or measurement; and
 - G) the records of quality assurance for continuous monitoring systems (including, but not limited to quality control activities, audits, and calibration drift checks) and source testing methods.
- 44. Pacific Gas and Electric Company shall maintain records on the occurrence and duration of any startup, shutdown, or malfunction in the operation of the CEM. [District Rule 213]
- 45. Pacific Gas and Electric Company shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring, sample collection, measurement, report, and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [District Rule 218]

REPORTING REQUIREMENTS

- 46. Pacific Gas and Electric Company shall submit quarterly reports on the continuous emissions monitoring systems to the District, in a District approved format, within 45 days from the end of the quarter and these shall include [District Rules 213 & 218]:
 - the time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions and preventative measures adopted; and
 - B) the averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant in question; and
 - time and date of each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of system repairs and adjustments; and
 - D) a negative declaration specifying when no excess emissions occurred; and
 - E) a summary of actual monthly emissions from the CEM for all equipment which

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operated during the quarter.

- 47. Pacific Gas and Electric Company shall submit quarterly Electronic Data Reports (EDR) to EPA for both Boilers 6-1 and 7-1. These reports must be submitted within 30 days following the end of each calendar quarter and shall include all information required in §75.64. [40 CFR Part 75]
- 48. Pacific Gas and Electric Company shall submit semiannual monitoring reports to the District, in a District approved format, no later than August 15 for the period of January 1 through June 30 and no later than February 15 for the period of July 1 through December 31. [District Rule 218]

These monitoring reports shall include at a minimum:

- the time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions and preventative measures adopted;
 and
- B) the averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant in question; and
- C) all information pertaining to any monitoring as required by this permit; and
- D) a negative declaration specifying when no excess emissions occurred.
- 49. Pacific Gas and Electric Company shall submit an annual compliance certification report to the District and U.S. EPA, in a District approved format, no later than February 15 for the period of January 1 through December 31 of the preceding year [District Rule 218].

This report shall include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report and shall include at a minimum:

- A) identification of each term or condition of the permit that is the basis of the certification; and
- B) the compliance status; and
- C) whether compliance was continuous or intermittent; and
- D) the method(s) used for determining the compliance status of the source, currently and over the reporting period.

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- 50. Pacific Gas and Electric Company shall comply with all conditions of this federal operating permit. Any noncompliance with a permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [District Rule 218]
- 51. In an enforcement action, the fact that Pacific Gas and Electric Company would have to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit is not a defense. [District Rule 218]
- 52. This permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the District. The filing of a request by Pacific Gas and Electric Company for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 218]
- This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. [District Rule 218]
- 54. Pacific Gas and Electric Company shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, Pacific Gas and Electric Company shall also furnish to the District copies of records required to be retained by this permit. [District Rule 218]
- 55. For applicable requirements that will become effective during the permit term, Pacific Gas and Electric Company shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [District Rule 218]
- 56. Any document submitted to the District pursuant to this permit shall contain certification by the responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Pacific Gas and Electric Company shall promptly, upon discovery, report to the District a material error or omission in these records, reports, plans, or other documents. [District Rule 218]
- 57. Pacific Gas and Electric Company shall report any violation of any requirement contained in this permit to the District within 96 hours after such occurrence. The violation report shall include the time intervals, date and magnitude of excess emissions; nature and cause of the excess (if known), corrective actions and preventive measures adopted. [District Rules 214 and 218]
- 58. Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, record keeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with. [District Rule 218]

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- 59. For this federal operating permit to remain valid through the permit term of five years from the date of issuance, Pacific Gas and Electric Company shall pay an annual emission fee based upon the requirements of District Rule 308. [District Rule 218]
- 60. Pacific Gas and Electric Company shall have available at the facility at all times a copy of this federal operating permit. [District Rule 218]
- 61. For protection from enforcement action based upon an emergency, as defined in District Rule 218, the responsible official for Pacific Gas and Electric Company shall submit to the District relevant evidence which demonstrates [District Rule 218]:
 - A) an emergency occurred; and
 - B) that Pacific Gas and Electric Company can identify the cause(s) of the emergency; and
 - C) that the facility was being properly operated at the time of the emergency; and
 - D) that all steps were taken to minimize the emissions resulting from the emergency; and
 - E) within two working days of the emergency event, Pacific Gas and Electric Company provided the District with a description of the emergency and any mitigating or corrective actions taken.
- 62. Upon presentation of credentials, Pacific Gas and Electric Company shall allow the District, the ARB, the EPA, or an authorized representative, to perform the following [District Rule 218]:
 - enter upon the premises where the federal operating permit source is located or in which any records are required to be kept under the terms and conditions of this federal operating permit;
 - B) to have access to and copy any records required to be kept under the terms and conditions of this federal operating permit;
 - to inspect any equipment, operation, or process described or required in this federal operating permit; and,
 - D) to sample emissions from the source.

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MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT TITLE IV ACID RAIN PERMIT

24580 Silver Cloud Court Monterey, CA 93940 Telephone: (408) 647-9411

Effective January 1, 1998 through December 31, 2002

ISSUED TO:

Pacific Gas and Electric Company Moss Landing Power Plant P.O. Box 27 Moss Landing, CA 95039-0027

PLANT SITE LOCATION:

Highway 1 and Dolan Road Moss Landing, CA 95039

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Douglas Quetin, Air Pollution Control Officer

Date

ORIS Code: 0260

Nature of Business: Electric Power Generation

SIC Code: 4911 - Electric Power Generation

DESIGNATED REPRESENTATIVE: ALTERNATE DESIGNATED

REPRESENTATIVE:

Name: E. James Macias Name: Randal S. Livingston

Title: Senior Vice President & General Manager Title: Manager

Generation, Transmission & Supply Steam Generation

Phone: (415) 973-1441 Phone: (415) 973-6950

FACILITY CONTACT PERSON:

Name: Steve Abbott

Title: Environmental Coordinator

Phone: (408) 633-6649

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ACID RAIN PERMIT CONTENTS

- 1) Statement of Basis
- 2) SO₂ allowances allocated under this permit and NO_x requirements for each affected unit.
- Comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process, and any additional requirements or conditions.
- 4) The permit application submitted for this source. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application.

1) STATEMENT OF BASIS

Statutory and Regulatory Authorities: In accordance with District Rules 218 and 219 and Titles IV and V of the Clean Air Act, the Monterey Bay Unified Air Pollution Control District issues this permit pursuant District Rules 218 and 219.

2) SO₂ ALLOWANCE ALLOCATIONS

	Year	1998	1999	2000	2001	2002
	SO ₂ allowances under Tables 2, 3, or 4 of 40 CFR Part 73	NA	NA	8854 [*]	8854 [*]	8854 [*]
UNIT 6-1	NO _x Limit	This unit is not subject to the NO _x requirements from 40 CFR Part 76 as this unit is not capable of firing on coal.				

	Year	1998	1999	2000	2001	2002
	SO ₂ allowances under Tables 2, 3, or	NA	NA	975 [*]	975 [*]	975 [*]
UNIT 7-1	4 of 40 CFR Part 73					

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NO _x Limit	This unit is not subject to the NO _x requirements from 40 CFR Part 76 as this unit is not capable of firing on coal.
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The number of allowances allocated to Phase II affected units by USEPA may change in a 1998 revision to 40 CFR part 73 Tables 2, 3, and 4. In addition, the number of allowances actually held by an affected source in a unit account may differ from the number allocated by USEPA. Neither of the aforementioned conditions necessitate a revision to the unit SO₂ allowance allocations identified in this permit.

3) COMMENTS, NOTES AND JUSTIFICATIONS

None

4) PERMIT APPLICATION

Attached